



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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July 10, 2008

Ref: 8EPR-N

Noelle Meier  
Motorized Travel Plan Project Team Leader  
Dixie National Forest  
1789 N. Wedgewood Lane  
Cedar City, UT 84720

Re: Dixie National Forest Motorized Travel Plan  
Draft EIS: CEQ # 20080200

Dear Ms. Meier:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) 42 U.S.C. Section 4231 et. seq., and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the Dixie National Forest Motorized Travel Plan Draft Environmental Impact Statement (DEIS). The purpose of this project is management of Off Highway Vehicles (OHVs) in partnership with other federal, state, local, community and interest groups to protect public lands and resources while providing opportunities for the safe use and enjoyment of OHVs on designated roads and trails with the Dixie National Forest. The Dixie National Forest is located in Garfield, Iron, Kane, Piute, Wayne and Washington counties in south central and southwestern Utah. The project area for the Motorized Travel Plan comprises approximately 1,883,730 acres.

A more detailed supplemental Roads Analysis Process report (RAP) is referenced in, and is integral information to, this DEIS. The RAP report analyzed non-system roads and trails and weighed those needs against possible environmental, social, and safety concerns. This analysis was critical to informing the purpose and need and alternatives development under NEPA. The proposed action would address the following four components: 1) prohibition of motorized cross-country travel, 2) designation of authorized National Forest system roads and motorized trails, 3) designation of authorized uses of National Forest system roads and motorized trails, 4) construction or relocation of designated National Forest System roads and motorized trails. In addition to the No Action Alternative, the report considers four Action Alternatives that address the proposed action to varying degrees.

Pursuant to EPA policy and guidance, EPA rates the environmental impact of an action and the adequacy of the NEPA analysis. EPA has rated all of the Action Alternatives presented in this DEIS as "LO" Lack of Objection because all of the Action Alternatives will eliminate

cross country travel and designate a motorized travel system resulting in better management and protection of natural resources. Alternative B will achieve the greatest environmental results to meet the purpose and need of the project. In addition to the elimination of all cross country travel in the Forest (which is common to all Alternatives), this alternative will assure closure (and reduction of resource impacts) of the greatest number of miles of “unauthorized” travel roads and the least addition of road miles for “administrative” usage. Alternative C closely tracks Alternative B in achieving similar environmental results and meeting the purpose and need of the project.

EPA’s comments on this DEIS are largely affirmative due to the reduction in natural resource impacts that will occur as a result of elimination of cross country travel and a better management of the travel route system. However, a more thorough analysis of natural resource impacts resulting from new road construction and lack of, or reduced, maintenance should be completed. These resource impacts, especially impacts due to erosion should be identified, evaluated and disclosed in this document.

EPA recognizes that the trend of increased OHV use is likely to continue due to population growth, advances in recreation technology, increased availability of information and improved access to remote areas. We support the Motorized Travel Plan proposal to prohibit motorized cross-country travel in undesignated areas and to designate authorized routes and uses of routes while minimizing current or anticipated effects on wildlife and habitat and other environmental resources. More specific comments on resource impacts from both proposed and existing roads, monitoring, enforcement, and clarifying language are enclosed. If you have questions on these comments, please contact me at (303)312-6004. You may also contact Robin Coursen of my staff at (303)312-6695.

Sincerely,

/s/ Deborah Lebow Aal  
for Larry Svoboda  
Director, NEPA Program  
Office of Ecosystems Protection and Remediation

Enclosures



## **Dixie National Forest DEIS NEPA Comments**

### **General**

- EPA agrees that the transition from the unmanaged motorized recreation to restricted travel will result in better protection of natural resources. This action anticipates population growth and usage and its impacts on resources and the watershed of the Dixie Forest.
- While the project does minimize new road construction, we have concerns about the resource impacts caused by construction of new, or relocation of designated routes. The DEIS references the RAP which considers the need for the remaining system and non-system roads and trails and weighs those needs against possible environmental, social and safety concerns. Will the RAP analysis be used to predict areas of highest resource impacts and inform decisions concerning routes for these new and relocated roads? If not, how will the least environmentally damaging new or relocated route be determined?
- Monitoring: Please describe or reference the document that provides details regarding monitoring of resource impacts (improvement or decline). Will an adaptive management plan be used? Please describe how the Forest Service will conduct the essential monitoring to ensure that the project is meeting objectives and mitigating impacts as predicted. Please describe financial resource commitment to such activities.
- Enforcement: Please describe the Dixie Forest's enforcement plan for implementation of the prohibition on cross country travel and new designated routes. How will Dixie National Forest evaluate or determine compliance with procedures established in Executive Order 11989 (1977) regarding the use of off-road vehicles on public lands.

### **Alternatives**

- EPA has reviewed the Table 2-5 summary of alternatives by Issue and Topic and we conclude that Alternative B and C (in comparison to alternatives A, D and E) would provide the greatest reduction in cross-country travel by OHVs and the greatest reduction in impacts resulting from such travel. These two alternatives would also achieve resource benefits and environmental results such as: reducing land use impacts, increasing acres of secure habitat, minimizing impacts to cultural resources minimizing the spread of noxious weeds, and preventing degradation of high value aquatic habitat.

### **Transportation**

- 2.5.1.7 The Forest Service has responsibility for protecting vital watershed within the Forest. We recommend that all new road environmental impacts, including construction and maintenance, should be identified, evaluated and disclosed in this document.
- The project engineer and hydrologist will determine which decommissioned roads would be best served by obliteration and will determine which type of closure would be the most effective. What factors are taken into account when making this decision?" Will there be consideration of environmental impacts when determining choice of roads and type of closure? Slope, erosion potential, stream crossings, critical habitat, etc. could be

used as criteria to make such determinations.

**Recommendation:** Please disclose impacts of new road construction and maintenance and describe the criteria used to make determination of road decommissioning and closure type.

### **Affected Environment**

- 3.15.2.2.3 It appears that, besides potential construction impacts of new unauthorized roads, other long term impacts of these roads may result due to low maintenance levels. The maintenance categories of the new roads to be constructed are not described. It appears that, since they are for administrative or permit usage, that the maintenance levels will be low—Level 2. Less than 20 percent of Maintenance Level 2 roads are maintained forest-wide. What are the maintenance levels of the new roads and what percentage of the new roads will be maintained? Please explain what is meant by “maintenance to reduce environmental impacts” for Level 2 roads. EPA requests further explanation of environmental impacts resulting from Level 2 (low level) road maintenance for the *existing and new construction roads*.

**Recommendation:** Please define the maintenance categories for the new unauthorized roads that will be constructed under the action alternatives. What percentage of these new roads will be maintained? Please describe the potential impacts resulting from anticipated maintenance levels of new roads.

### **Water Quality:**

- The FEIS should identify any existing perennial streams and lakes in the watershed (s) of the Forest that may be impacted by new road construction. If impacts are expected, current water quality data should be disclosed and potential impacts discussed. In addition, the DEIS does not mention wetland impacts. Please indicate if impacts of wetlands or other critical habitat will occur as a result of this project.